

RASSELSTEIN HOESCH GMBH EXCLUSION REQUEST

ATTACHMENT 4 WIDE WIDTH MATERIAL, OVER 38 INCHES

- (a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which the product enters the United States.

The merchandise subject to this request is known as single and double reduced electrolytically chromium- or tin-coated steel in width equal to or over 38 inches, regardless of temper, finish coating or other properties.

The applicable HTS provisions are: 7210.11.0000, 7210.12.0000, 7210.50.0000 and 7210.70.6090.

- (b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the products from products for which exclusion is not sought;

See product description in (a) above.

- (c) The basis for requesting an exclusion;

Due to the fact that this material is designed for end use D+1- or deep drawing process (DRD) there is a need for extra clean tin mill materials (i.e. free of non-metallic inclusions). Accordingly, the steel for this material must be selected specially, and the tin mill products in question are produced on lines with non-metallic inclusion detectors (IDD devices). Other European and Japanese mills do not have these devices.

- (d) The names and locations of any producers, in the United States and foreign countries of the product;

Rasselstein is unable to identify any other manufacturer making this particular product.

- (e) Total U.S. Consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and the projected annual consumption for each year from 2001 to 2005, with a basis for the projection;

US Consumption:

1996	60,000 short tons	\$42,000,000
1997	50,000 short tons	35,000,000
1998	55,000 short tons	38,000,000
1999	60,000 short tons	42,000,000
2000	65,000 short tons	45,000,000

Annual Projection:

2001-05	60,000 short tons	\$42,000,000
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Projections are estimates based on knowledge of actual market consumption and development.

- (f) Total US production of the product for each year from 1996 to 2000, if any;

Rasselstein is convinced that US mills do not produce any material in this wide range.

- (g) The identity of any US produced substitute for the product, total US production of the substitute for each year from 1996 to 2000, and the names of any US producers of the substitute;

Rasselstein is unable to identify any practical substitute product. Based upon its import experience, Rasselstein is convinced that the US mills do not produce any material in this wide range.

CONCLUSION

We understand that the purpose of the USTR investigation is to determine appropriate remedies for the importation of tin mill products, which are produced by the domestic industry. We believe that US production of this product is non-existent. Accordingly, we respectfully request that wide width material over 38 inches be excluded from any import restrictions, and that the language of any remedy order for HTS subheadings 7210.11.0000, 7210.12.0000, 7210.50.0000 and 7210.70.6090 clearly exclude this product.